

IN THE UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

RALPH S. JANVEY, IN HIS CAPACITY §
AS COURT APPOINTED RECEIVER §
FOR THE STANFORD RECEIVERSHIP §
ESTATE, and the OFFICIAL §
STANFORD INVESTORS COMMITTEE, §

Plaintiffs,

V.

Case No. 3:12-cv-00495-N-BL

ADAMS & REESE, LLP; BREAZEALE, §
SACHSE & WILSON, LLP; ROBERT §
SCHMIDT; JAMES AUSTIN; CLAUDE F. §
REYNAUD, JR.; CORDELL HAYMON; §
THOMAS FRAZER §

Defendants.

**MOTION AND SUPPORTING BRIEF OF DEFENDANT, CLAUDE F. REYNAUD, JR.,
TO JOIN, IN PART, DEFENDANT CORDELL HAYMON’S MOTION FOR LEAVE
TO DESIGNATE RESPONSIBLE THIRD PARTIES AND DEFENDANT
BREAZAEALE, SACHSE & WILSON’S MOTION TO JOIN,
IN PART, DEFENDANT HAYMON’S MOTION TO DESIGNATE**

The Defendant, Claude F. Reynaud, Jr. (“Reynaud”), requests entry of an Order allowing him to designate third parties, pursuant to Texas Civil Practices and Remedies Code, potentially responsible for the claims asserted in the captioned matter. In support of this Motion, Reynaud states:

1. Plaintiffs demand recovery against Reynaud for activities allegedly undertaken in his capacity as a Director of the Stanford Trust Company;
2. Plaintiffs seek to hold the Defendant, Breazeale, Sachse & Wilson, LLP (“BSW”), the law firm in which Reynaud is a partner, vicariously responsible for Reynaud’s alleged actions;

3. In the Plaintiffs' Amended Complaint in the captioned matter, and in pleadings filed by plaintiffs in other cases in which the same or similar issues are implicated, numerous individuals who have not been named as parties defendant herein have been specifically identified as having allegedly participated in various activities for which the Plaintiffs demand damages in this matter;

4. The Texas Civil Practices and Remedies Code provides that (a) defendants may seek leave of court to designate potentially responsible third parties, § 33.004, and (b) the trier of fact is to determine the percentage of fault of each third party who contributed to the claimed damages. § 33.003;

5. On December 16, 2013, the defendant, Cordell Haymon, filed his Motion for Leave to Designate potentially responsible Third Parties, Doc. # 71, in which he identified such potentially responsible third parties;

6. On February 6, 2014, BSW filed its Motion, Doc. # 82, to Join in Haymon's request for leave to Designate;

7. Reynaud incorporates herein as if fully set forth Section II of Haymon's Motion, and seeks permission to designate all persons identified therein, with the exception of BSW, the following potentially responsible third parties;

R. Allen Stanford, Laura Pendergest-Holt, Gilbert Lopez, Mark Kuhrt, James Davis, Adams & Reese, LLP, Robert Schmidt, James Austin, Stanford Group Company, Stanford Financial Group, Stanford International Bank, Ltd., Stanford Trust Company (Louisiana), Stanford Trust Company, Ltd. (Antigua) d/b/a Stanford Fiduciary Investor Services, Stanford Group Columbia a/k/a Stanford Bolsa y Banca, Stanford Group Ecuador a/k/a Stanford Group Casa de Valores, S.A., Stanford Trust Company Administradora de Fondos y Fideicomisos, S.A., Stanford Group Mexico a/k/a Stanford Group Mexico S.A. de C.V., Stanford Fondos, Stanford Group Panama a/k/a Stanford Bank Panama and Stanford Casa de Valores Panama, Stanford Group Peru a/k/a Stanford Group Peru S.A. Sociedad Agente de Bolsa, Stanford Group Venezuela a/k/a Stanford

Group Venezuela C.A., Stanford Bank Venezuela, Stanford Group Venezuela Asesores de Inversion, C.A.S. Hewlett & Co., Ltd., Lester Bird, Wrenford Ferrance, Tom Cash, Ivan Diaz, Michael Ancona, Jeffrey Balmer, Keith Ellenburg, Barry Hersh, Molwyn Joseph, Gaston Browne, Mauricio Alvarado, Leroy King, Rebecca Hamric, Lena Stinson, Juan Rodriguez-Tolentino, Juan Alberto Rincon, Proskauer Rose, LLP, Chadbourne & Parke, LLP, Thomas V. Sjoblom, BDO USA, LLP, BDO Global Coordination B.V., Brussels Worldwide Services BVBA, Daniel and/or Danny Bogar, Jay Comeaux, Jason Green, Michael Koch, R.E. Poppell, A.J. Rincon, Charles Weiser, Bernard and/or Bernie Young, Jay Zager, Rhonda Lear, J.D. Perry, Louis Fournet, Zack Parrish, Joe Klingen, Anthony D'Aniello, Michael Contorno, Jay Comeaux, Zack Parrish, Jason Green, James K. Conzelman, and Lionel C. Johnson.

8. For the reasons set forth above, Claude F. Reynaud, Jr., respectfully requests that this Court enter its Order to designate the persons identified in paragraph 7 of this Motion as potentially responsible third parties.

Respectfully submitted,

/s/ Bruce A. McKenna

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Attorneys for Claude F. Reynaud, Jr.

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that on February 7, 2014, he conferred with counsel for the Plaintiffs regarding the relief requested in the foregoing Motion. Counsel for the Plaintiffs advised that he did not agree to the requested relief and, as a result, this Motion is submitted for consideration.

/s/ Bruce A. McKenna

CERTIFICATE OF SERVICE

The undersigned certifies that on the 7th day of February, 2014, the foregoing Motion was served on counsel of record for all parties via the court's ECF system.

/s/ Bruce A. McKenna